1 2	MICHAEL HINCKLEY, State Bar No. 161645 803 Hearst Avenue Berkeley, California 94710 Telephone: (415) 706-1386	
3	Email: hinckley@michaelhinckleylaw.com Attorneys for Defendant	
4		DISTRICT COLIDT
5	UNITED STATES DISTRICT COURT	
6	NORTHERN DISTRICT OF CALIFORNIA	
7	OAKLAND DIVISION	
8	UNITED STATES OF AMERICA,	Case Nos. CR 18-0603-HSG
9	Plaintiff,	CENTRALLY A ENCANA AND IND OROGERDA
10	VS.	STIPULATION AND [PROPOSED] ORDER TO CONTINUE
11	JOHN VINOYA	SENTENCING DATE FROM APRIL 13, 2020 TO JUNE 1, 2020.
12	Defendant.	
13		
14	Defendant John Vinoya, by and through his newly appointed counsel Michael Hinckley	
15	and the United States of America, by and through Assistant United States Attorney Katherine	
16	Lloyd-Lovett, hereby stipulate and agree to continue the sentencing date in this matter from	
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18	April 13, 2020 at 2:00 p.m. to June 1, 2020 at 2:00 p.m.	
19	Good cause exists for this request. Mr. Vinoya's appointed counsel is working to resolve	
20	and coordinate outstanding issues associated with Mr. Vinoya's related state case. This process	
21	has been unexpectedly delayed as result of the public health crisis as well as visitation	
22	difficulties. The requested additional time is needed to complete these and related tasks.	
23	United States Probation Officer Karen Mar has no objection to this request.	
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STIPULATION AND (PROPOSED) ORDER U.S. V. JOHN VINOYA, CR 18-0603 (HSG)

1	IT IS SO STIPULATED.	
2	3/26/2020	/s/Katherine Lloyd-Lovett
3	Dated:	KATHERINE LLOYD-LOVETT
4		Assistant United States Attorney
5	3/26/2020	/s/Michael Hinckley
6	Dated:	MICHAEL HINCKLEY
7		Attorneys for Defendant
8		
9		
10	[PROPOSED] ORDER	
11		
12	GOOD CAUSE APPEARING, upon stipulation of the parties, the date for sentencing	
13	continued from April 13, 2020 at 2:00 p.m. to June 1, 2020 at 2:00 p.m.	
14		
15	IT IS SO ORDERED.	
16	DATED:3/27/2020	HONORABLE HAYWOOD S. GILLIAM, JR.
17		United States District Judge
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STIPULATION AND (PROPOSED) ORDER U.S. V. JOHN VINOYA, CR 18-0603 (HSG)

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